

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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CLERK

UNITED STATES OF AMERICA)

BY AL
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v.)

Crim. No.:

5:22-cr-86-1-2

AARON DANG and)

KHADKA BADAL,)

Defendant)

INDICTMENT

The Grand Jury charges:

COUNT 1

In or about July 2021, in the District of Vermont, the defendant AARON DANG knowingly possessed a stolen firearm, that is, a Glock model 19 9mm pistol s/n BSCB689, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe the firearm was stolen.

(18 U.S.C. § 922(j) and 924(a)(2))

COUNT 2

On September 10, 2021, KHADKA BADAL willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating the following during an interview with an ATF Special Agent: that during the summer of 2021, a person with the initials M.N. had driven him (KHADKA BADAL) to and from a party in Montpelier, Vermont and during those drives, the only two people in the vehicle were M.N. and KHADKA BADAL. These statements and representations were false because, as KHADKA BADAL knew, the vehicle was occupied by four total people (including KHADKA BADAL) and M.N. was not the driver of the vehicle.

(18 U.S.C. § 1001(a)(2))

A TRUE BILL

REDACTED

FOREPERSON



NIKOLAS P. KEREST (WLF)

United States Attorney

Burlington, Vermont

July 21, 2022